

1 WILLIAM J. GEDDES
Nevada Bar No. 6984
2 KRISTEN R. GEDDES
Nevada Bar No. 9027
3 THE GEDDES LAW FIRM, P.C.
8600 Technology Way, Suite 107
4 Reno, Nevada 89521
Phone: (775) 853-9455
5 Fax: (775) 299-5337
Email: Will@TheGeddesLawFirm.com
6 *Attorneys for Plaintiff John Enos*

7 RAELENE K. PALMER
Nevada Bar No. 8602
8 GALLIAN WELKER & BECKSTROM, L.C.
540 E. St. Louis Avenue
9 Las Vegas, Nevada 89104
Phone: (702) 892-3500
10 Fax: (702) 386-1946
Email: rpalmer@vegascase.com
11 *Attorneys for Plaintiff John Enos*

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 JOHN ENOS, an individual,

15 Plaintiff,

16 vs.

17 DOUGLAS COUNTY, a political subdivision
of the State of Nevada; SCOTT SHICK, Chief
18 Juvenile Probation Officer of the Juvenile
Probation Department; *et al.*

19 Defendants.
20
21

CASE NO: 3:17-cv-00095-MMD-CBC

**STIPULATION AND [PROPOSED]
ORDER TO ENLARGE TIME TO FILE
REPLY TO OPPOSITIONS TO MOTIONS
FOR PARTIAL SUMMARY JUDGMENT
[ECF 106 and 107]**

(First Request)

22 COMES NOW Plaintiff JOHN ENOS and Defendants DOUGLAS COUNTY, SCOTT SHICK,
23 and VICTORIA SAUER-LAMB, by and through their undersigned attorneys of record, and hereby
24 request a 2-week enlargement of time for the parties to file their replies to the oppositions to motions
25 for partial summary judgment (ECF Nos. 106 and 107), filed on September 3, 2019. These replies are
26 currently due on Tuesday, September 17, 2019, and the parties request an additional two weeks,
27 **through and including Tuesday, October 1, 2019**, to file their reply briefs. This is the parties' first
28 request to extend this deadline. The parties submit that this request is not for the purpose of undue

1 delay, but arises from caseload and calendaring issues. Accordingly, the Parties request an additional
2 two weeks to file these reply briefs.

3 Dated this 10th day of September 2019.

4 THE GEDDES LAW FIRM, P.C.

5 By: 

6 KRISTEN R. GEDDES
7 Nevada Bar Number 9027
8 8600 Technology Way, Suite 107
9 Reno, Nevada 89521
10 Phone: (775) 853-9455
11 *Attorneys for Plaintiff John Enos*

12 Dated this 10th day of August 2019.

13 THORNDAL ARMSTRONG DELK
14 BALENBUSH & EISINGER

15 *Electronic Signature Authorized*

16 /s/

17 By: _____

18 Katherine F. Parks, Esq.
19 6590 S. McCarran Blvd, Suite B
20 Reno, Nevada 89509
21 Phone: (775) 786—2882
22 *Attorneys for Defendants Douglas*
23 *County and Scott Shick*

24 **II.**

25 **ORDER**

26 IT IS SO ORDERED.

27 Dated: September 10, 2019

28 

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Geddes Law Firm, P.C., and that on **September 10, 2019**, I caused to be served a copy of the foregoing *Stipulation and [Proposed] Order to Enlarge Time To File Replies to the Oppositions Motions For Partial Summary Judgment [ECF 106 and 107]* by electronic filing with the Court's PACER e-filing system, addressed to:

Katherine F. Parks, Esq.
THORNDAL ARMSTRONG DELK BALENBUSH & EISINGER
6590 S. McCarran Blvd, Suite B
Reno, Nevada 89509
Phone: (775) 786-2882
Attorneys for Defendants Douglas County, Scott Shick, and Victoria Sauer-Lamb



KRISTEN R. GEDDES
An employee of the Geddes Law
Firm, P.C.